# Case 2:17-cv-01514-JCM-NJK Document 138 Filed 03/10/21 Page 1 of 4

1 2 3 4 5 6	Edward Griffith (admitted pro hac vice) THE GRIFFITH FIRM 45 Broadway, Suite 2200 New York, New York 10006 (212) 363-3784 (646) 645-3784 (cell) eg@thegriffithfirm.com Attorneys for Plainitff Edyta Gryglak  UNITED STATES D	
7	DISTRICT OF NEVADA	
8 9	EDYTA GRYGLAK, formerly known as EDYTA A. FROMKIN,	Case No.: 2:17-cv-01514-JCM-NJK
10	Plaintiff,	STIPULATION AND ORDER
11	VS.	TO EXTEND PLAINTIFF'S TIME TO RESPOND TO DEFENDANTS'
12	HSBC BANK USA, N.A., as trustee for WELLS FARGO HOME EQUITY ASSET-BACKED CERTIFICATES, Series 2006-3,	MOTION TO REOPEN DISPOSITIVE MOTION DEADLINE
13 14	by its Attorney-in-fact WELLS FARGO BANK, N.A.; WELLS FARGO BANK, N.A.; and WELLS FARGO ASSET	(FIRST REQUEST)
15		
16	Defendants.	
17	Defendants HSBC Bank USA, N.A., as trustee for Wells Fargo Home Equity Asset-Backed	
18	Certificates, Series 2006-3, by its Attorney-in-fact Wells Fargo Bank, N.A., Wells Fargo Bank,	
19	N.A., and Wells Fargo Asset Securities Corporation (collectively, "Defendants") and Plaintiff	
20	Edyta Gryglak ("Plaintiff" and together with Defendants, the "Parties") hereby stipulate to extend	
21	by one week the due date for Plaintiff to file opposition papers to Defendants' Motion to Reopen	
22	Dispositive Motion Deadline [ECF 136] (the "Motion to Reopen"). If approved, this stipulation	
23	would extend the due date from March 10, 2021 to March 17, 2021.	
<ul><li>24</li><li>25</li></ul>	WHEREAS Defendants filed their Motion to Reopen on February 24, 2021;	
26	WHEREAS Plaintiff Edyta Gryglak's due date to file opposing papers is March 10, 2021;	
27	WHEREAS since Wells Fargo filed the Motion to Reopen on February 24, 2021, Ms.	
28	Gryglak's lead counsel, Edward Griffith, has been	actively involved matters pending in the United

- 1 -

#### 1 States District Court for the Southern District, the United States District Court for the Northern 2 District of Georgia and the Los Angeles Superior Court. As a result, he needs an additional week 3 to complete and file Ms. Gryglak's response to Wells Fargo's Motion to Reopen. 4 WHEREAS Wells Fargo consents to this request; 5 THE PARTIES HEREBY STIPULATE: 6 1. Ms. Gryglak's due date to file papers in opposition to Wells Fargo's Motion to 7 Reopen is extended by one week, from March 10, 2021 to March 17, 2021. 8 Dated: March 10, 2021 Dated: March 17, 2021 9 SNELL & WILMER L.L.P. THE GRIFFITH FIRM 10 /s/ Blakeley E. Griffith /s/ Edward Griffith 11 By: By: Blakeley E. Griffith (NV Bar No. 12386) Edward Griffith (pro hac vice) 12 3883 Howard Hughes Parkway, Suite 1100 45 Broadway, Suite 2200 New York, New York 10006 Las Vegas, Nevada 89169 13 (646) 645-3784 (mobile) (702) 784-5200 (212) 363-3790 (fax) (702) 784-5252 (fax) 14 Attorneys for Defendants Attorney for Plaintiff 15 16 17 18 19 20 21 22 23 24 25 26 27 28

Case 2:17-cv-01514-JCM-NJK Document 138 Filed 03/10/21 Page 2 of 4

#### Case 2:17-cv-01514-JCM-NJK Document 138 Filed 03/10/21 Page 3 of 4

**ORDER** IT IS HEREBY ORDERED that the due date for Plaintiff to file papers in opposition to Defendants' Motion to Reopen Dispositive Motion Deadline is extended by one week, from March 10, 2021 to March 17, 2021. IT IS SO ORDERED. DATED March 12, 2021. 

### Case 2:17-cv-01514-JCM-NJK Document 138 Filed 03/10/21 Page 4 of 4

## **CERTIFICATE OF SERVICE** I hereby certify that on March 10, 2021, I electronically filed the foregoing STIPULATION with the Clerk of Court for the U.S. District Court, District of Nevada by using the Court's CM/ECF system. Participants in the case who are registered CM/ECF users will be served by the CM/ECF system. DATED this 10<sup>th</sup> day of March 2021. /s/ Edward Griffith EDWARD GRIFFITH, ESQ